



Alexandra E. Blackmore  
*Senior Attorney*

February 24, 2006

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110

**Re: D.T.E. 05-82; Petition to Intervene of Massachusetts Electric Company d/b/a  
National Grid**

Dear Secretary Cottrell:

I am submitting for filing an original and three (3) copies of the Petition to Intervene of  
Massachusetts Electric Company d/b/a National Grid in the above-captioned proceeding.

Thank you very much for your time and attention to this matter.

Very truly yours,

A handwritten signature in black ink that reads "Alexandra E. Blackmore". The signature is written in a cursive, flowing style.

Alexandra E. Blackmore

cc: Joseph W. Rogers, Office of the Attorney General

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

---

**RE: NOTICE OF INVESTIGATION  
AND  
PUBLIC HEARING**

---

**D.T.E. 05-82**

**PETITION TO INTERVENE OF  
MASSACHUSETTS ELECTRIC COMPANY D/B/A NATIONAL GRID**

Pursuant to 220 C.M.R. § 1.03, and the Department's February 10, 2006 Notice of Investigation and Public Hearing ("Notice"), Massachusetts Electric Company d/b/a National Grid ("National Grid") respectfully submits this Petition to Intervene ("Petition") in the above-captioned docket. In support of its Petition, National Grid states the following:

1. On November 11, 2005, Dig Safe System, Inc. filed with the Department a petition to implement 811 as the abbreviated dialing code for providing notification of excavation activities to underground facility operators in Massachusetts.
2. National Grid and its affiliated companies are underground facility operators in Massachusetts.
3. Under Chapter 164, Section 76D of the Massachusetts General Laws, as a public utility, National Grid and its affiliated companies "shall create, participate in and be responsible for the administration of a utility underground plant damage prevention system." National Grid meets this obligation by receiving notices and also through its participation in and responsibility for the administration of Dig Safe System, Inc., the underground plant damage prevention system serving Massachusetts.

4. Under Chapter 82, Section 40B of the Massachusetts General Laws, as an operator of underground facilities, National Grid and its affiliates are obligated to respond to notices from the underground plant damage prevention system by marking such facilities.
5. Because National Grid and its affiliated companies are ultimately responsible, at least in part, for the administration of Dig Safe System, Inc., determinations made by the Department in this proceeding concerning the implementation of 811 as the abbreviated dialing code for providing notification of excavation activities to underground facility operators may affect National Grid and its affiliates in carrying out their responsibility for participating in and administering Dig Safe System, Inc.
6. For these reasons, National Grid is “substantially and specifically affected by this proceeding” and the Department should approve this Petition. See M.G.L. c. 30A, § 10.

WHEREFORE, National Grid respectfully requests that the Department grant this Petition.

Massachusetts Electric Company d/b/a  
National Grid

By its attorney,



Alexandra E. Blackmore  
Senior Attorney  
National Grid  
25 Research Drive  
Westborough, MA 01582  
(508) 389-3243

February 24, 2006

CERTIFICATE OF SERVICE

I certify that copies of the foregoing document have been served this date on all persons named on the service list in Docket D.T.E. 05-82.

Alexandria E. Blackmore  
Alexandra E. Blackmore, Esq.

February 24, 2006